

In the Matter of)
) FCC 14-61
Protecting the Open Internet NPRM)

Introduction

In addition to its broadcast licensee activities, Minnesota Public Radio, under the trade name American Public Media ("APM"), is the largest station based producer and distributor of non-commercial educational programming in the country. APM produces and distributes award winning series, including *A Prairie Home Companion with Garrison Keillor*®, *Marketplace*®, *Splendid Table*®, *Performance Today*® and *SymphonyCast*®. The weekly audience for these APM-produced and nationally-distributed programs is 18

million listeners. These programs are broadcast on over 900 public radio stations across the country.

The weekly come of all of the APM Group radio stations combined is almost two million listeners per week.

The commitment of the APM Group to high-quality programming is evidenced in the nearly 1,000 broadcasting and journalism awards the organizations have won, including seven George Foster Peabody awards, six Robert F Kennedy Journalism awards, and an Alfred I DuPont-Columbia University Gold Baton award.

Central to all of the work done at the APM Group are our mission statements. The mission statements of all the companies in the APM Group are similar:

The mission of Classical South Florida is to enrich the minds and nourish the spirit of our community through the art, availability and advocacy of classical music.

The mission of Southern California Public Radio is to strengthen the civic and cultural bonds that unite Southern California's diverse communities by providing the highest quality news and information service through radio and other interactive media. We will be a public forum that engages its audiences in an ongoing dialogue and exploration of issues, events and cultures in the region and in the world, seeking to provide greater understanding and new perspectives to the people of these communities and their leaders.

The mission of American Public Media and Minnesota Public Radio is to enrich the mind and nourish the spirit, thereby enhancing the lives and expanding the perspectives of our audiences, and assisting them in strengthening their communities.

We believe that the common thread among public radio producers is a public service mission to offer news, information and cultural programming that is responsive to the needs of the public – locally, regionally and nationally; that constitutes an expression of diversity and excellence; that involves creative risks; and that serves as an alternative to the mass media. The APM Group supports and attempts to carry out a similar mission in all that we do.

In the last twenty years, in addition to our radio broadcast services, the APM Group has developed a series of robust websites that include audio, video, photographs and text. See mpr.org, csf.org and scpr.org. Each month nearly 3 million visitors sign onto the websites of the APM Group (source: comScore). We have more than 2 million monthly requests for live streams (source: Stream Guys), and more than 700,000 monthly video requests (sources: YouTube, Brightcove, Vimeo.)

We know that our radio audience spans across all demographic sectors of society. While more limited, we believe our website audience has similar diversity as well. For example, we have data that indicates that 20% of the APM Group's website visitors are from households with a household income of less than \$40,000 (Source: comScore, June 2014). Our organization's goal is to continually further our audience diversity – be it on the radio or via websites or other digital offerings – that allows us to serve the entire population. Anything that hinders that goal, such as unequal Internet access, negatively affects our public service.

As we have expanded our public service to these new platforms, our underlying values of providing free access to quality journalism and cultural programming has remained as our guiding principal. As the nation wrestles with the impact of the digital divide and the reality that many people and communities do not have the ability to use superfast Internet lanes, we have kept our public service programming accessible to everyone.

I. What is the current role of the Internet's openness in facilitating innovation, economic growth, free expression, civic engagement, competition, and broadband investment and deployment.... Additionally, we seek comment on the impact of openness of the Internet on free expression and civic engagement. (question posed in paragraph 34 of the NPRN)

The APM Group sees the Internet as vital to our public service model. Radio listenership is decreasing over time as the public moves to partake of our public service programming over the Internet. The ability of all members of the public who either have a radio, smartphone, tablet, or internet access (either through their local public library or their home or office) to have access to the vital public service is essential.

A key component to free expression and civic engagement is access to information. Public media has long ensured that the public has access to information that matters in their community. An open Internet ensures that the public can access the information they need to know about their community. Without this information their ability to be civically engaged diminishes.

APM works every day to be an indispensable resource for our audiences and an essential public service for our communities. This is true for our work on the radio and Internet. Our audiences no longer access public media through FM radio alone. They may stream our content on their smartphones, read it on their computer, or explore our websites on their tablets. This unfettered access across platforms ensures they are connected to their communities. This connection promotes free expression and deepens civic engagement.

Our role as a public service does not change because our audience increasingly accesses our content through the Internet. However, an Internet that favors the "haves" over the "have nots" will infringe on free expression and threaten civic engagement.

The APM Group is concerned about access to our content by our audiences, but we are also concerned about the costs to the APM Group to supply our public service. As stated above, we are a group of non-commercial, non-profit companies. We may not have the resources to pay increased costs for bandwidth if the costs to provide content on the Internet increases.

II. Should there be restrictions imposed by the government to safeguard Internet openness?

Yes.

Paragraph 40 of the NPRM discusses the unhappy results in Europe as a result of the lack of rules or policies prohibiting blocking and discriminatory practices like the Commission's open Internet Regulatory policies. While the APM Group does not have any specific suggestions for how to accomplish safeguarding Internet openness, we support the general outlines of the Commission's policies of the last decade to safeguard Internet openness.

The APM Group firmly believes that we cannot continue to be the strong public service that we currently are if a "fast lane" is established only for those that can afford it.

III. Chairman Wheeler's Comments.

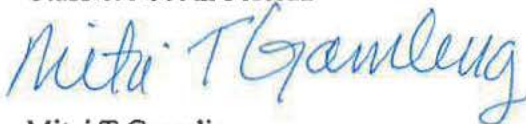
The APM Group heartily endorses the message of Chairman Wheeler in his Statement to the NPRM.

IV. Conclusion

For the foregoing reasons, the APM Group supports the proposal for the Commission to retain its past policies concerning openness of the Internet in a way that satisfies the Courts and protects the American people from different costs and levels of Internet service.

Respectfully Submitted,

American Public Media Group
Minnesota Public Radio | American Public Media
Southern California Public Radio
Classical South Florida

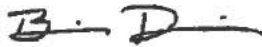


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